

ROBERT GUILD

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BY ELECTRONIC FILING AND SERVICE

February 13, 2019

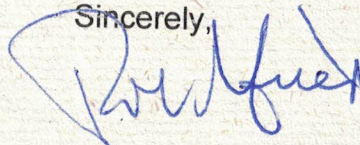
Heather Shirley Smith, Esquire
Deputy General Counsel
Duke Energy
40 W. Broad Street, Suite 690
Greenville, SC 29601

In re: Application of Duke Energy Progress, LLC for Adjustments in Electric Rate
Schedules and Tariffs and Request for an Accounting Order
Docket No. 2018-318-E

Dear Ms. Smith:

Enclosed please find for your consideration in the above docket Sierra Club's Second Set of Data Requests which is being served upon you electronically this date. In light of the schedule in this matter we ask that your responses be provided to us within ten (10) days, or as soon as the requested information can be made available. Should you have any questions about these requests please do not hesitate to call me. With kind regards I am

Sincerely,



Robert Guild

Encl.s

CC: PSC Clerk



STATE OF SOUTH CAROLINA

(Caption of Case)

In re: Application of Duke Energy Progress, LLC for
Adjustments in Electric Rate Schedules and Tariffs
and Request for an Accounting Order

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2018 - 318 - E

(Please type or print)

Submitted by: Robert GuildSC Bar Number: 2358Address: 314 Pall Mall StreetTelephone: (803) 917 573Columbia, SC 29201

Fax: _____

Other: _____

Email: bguild@mindspring.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☐ Request for item to be placed on Commission's Agenda expeditiously☒ Other: Discovery

INDUSTRY (Check one)

NATURE OF ACTION (Check all that apply)

- ☒ Electric
☐ Electric/Gas
☐ Electric/Telecommunications
☐ Electric/Water
☐ Electric/Water/Telecom.
☐ Electric/Water/Sewer
☐ Gas
☐ Railroad
☐ Sewer
☐ Telecommunications
☐ Transportation
☐ Water
☐ Water/Sewer
☐ Administrative Matter
☐ Other: _____

- | | | |
|--|--|--|
| <input type="checkbox"/> Affidavit | <input type="checkbox"/> Letter | <input type="checkbox"/> Request |
| <input type="checkbox"/> Agreement | <input type="checkbox"/> Memorandum | <input type="checkbox"/> Request for Certification |
| <input type="checkbox"/> Answer | <input type="checkbox"/> Motion | <input type="checkbox"/> Request for Investigation |
| <input type="checkbox"/> Appellate Review | <input type="checkbox"/> Objection | <input type="checkbox"/> Resale Agreement |
| <input type="checkbox"/> Application | <input type="checkbox"/> Petition | <input type="checkbox"/> Resale Amendment |
| <input type="checkbox"/> Brief | <input type="checkbox"/> Petition for Reconsideration | <input type="checkbox"/> Reservation Letter |
| <input type="checkbox"/> Certificate | <input type="checkbox"/> Petition for Rulemaking | <input type="checkbox"/> Response |
| <input type="checkbox"/> Comments | <input type="checkbox"/> Petition for Rule to Show Cause | <input type="checkbox"/> Response to Discovery |
| <input type="checkbox"/> Complaint | <input type="checkbox"/> Petition to Intervene | <input type="checkbox"/> Return to Petition |
| <input type="checkbox"/> Consent Order | <input type="checkbox"/> Petition to Intervene Out of Time | <input type="checkbox"/> Stipulation |
| <input checked="" type="checkbox"/> Discovery | <input type="checkbox"/> Prefiled Testimony | <input type="checkbox"/> Subpoena |
| <input type="checkbox"/> Exhibit | <input type="checkbox"/> Promotion | <input type="checkbox"/> Tariff |
| <input type="checkbox"/> Expedited Consideration | <input type="checkbox"/> Proposed Order | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Interconnection Agreement | <input type="checkbox"/> Protest | |
| <input type="checkbox"/> Interconnection Amendment | <input type="checkbox"/> Publisher's Affidavit | |
| <input type="checkbox"/> Late-Filed Exhibit | <input type="checkbox"/> Report | |

Print Form

Reset Form

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2018-318-E

In re: Application of Duke Energy Progress, LLC for Adjustments in Electric Rate Schedules and Tariffs and Request for an Accounting Order

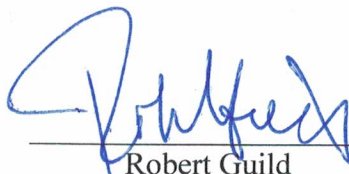
**SIERRA CLUB'S SECOND SET OF
 DATA REQUESTS
 FEBRUARY 13, 2019**

Intervenor Sierra Club, by and through undersigned counsel, serves the following discovery requests on Duke Energy Progress, LLC ("DEP" or the "Company") in the above-referenced docket. These requests are continuing in nature to the extent permitted by the rules of the South Carolina Public Service Commission and the South Carolina Rules of Civil Procedure. Please refer to Definitions and Instructions included in Sierra Club's First Set of Data Requests, served February 11, 2019.

REQUESTS

1. Please provide all cost/benefit, cash flow, and other analyses, and any associated presentations, used to justify or support any capital expenditures in excess of one million dollars at each of the Company's coal plants between 2010 and 2018.
2. Please provide all cost/benefit, cash flow, and other analyses, and any associated presentations, used to justify or support any anticipated capital expenditures in excess of one million dollars at each of the Company's coal plants.
3. Reference Miller Direct Testimony at page 5, lines 4–8. Witness Miller testifies that "This inventory of coal-fired assets with emission control equipment enhances the Company's ability to maintain current environmental compliance and concurrently utilize coal with increased sulfur content; thereby providing flexibility for DE Progress to procure the most cost-effective options for fuel supply."
 - a. Please provide the average sulfur content, by month, for coal consumed at each of the Company's coal-fired generating units.
 - b. Please provide the sulfur emission rate (lbs per MWh gross production) and total sulfur dioxide (SO₂) emitted, by month, at each of the Company's coal-fired generating units.

4. Reference Miller Direct Testimony at page 11, lines 17–22. Witness Miller refers to “the most recently published North American Electric Reliability Council (“NERC”) Generating Unit Statistical Brochure (“NERC Brochure”) representing the period 2013 through 2017.” Please provide a copy of the brochure.
5. Reference Doss Direct Testimony at page 10, line 11. Witness Doss’s testimony refers to “updated probable generation plant retirement dates.” For each of the Company’s coal-fired units with an updated probable retirement date, please identify the most recent updated probable retirement date as well as the retirement date assumptions from the Company’s two previous depreciation studies.
6. Please identify the completion date of the past three depreciation studies and identify if and when the depreciation schedule presented in each of the three studies was used for rate-setting purposes.



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(803) 917-5738

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DOCKET NO. 2018-318-E

In re: Application of Duke Energy
Progress, LLC for Adjustments in
Electric Rate Schedules and Tariffs and
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CERTIFICATE OF SERVICE

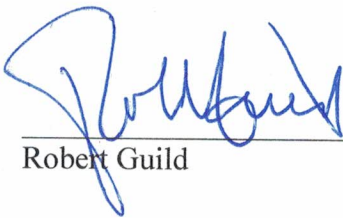
I hereby certify that I have served the persons listed below, a copy of the Sierra Club's
Second Set of Data Requests via electronic mail on this day, February 13, 2019.

Heather Shirley Smith,
heather.smith@duke-energy.com

John Burnett, john.burnett@duke-energy.com

Molly McIntosh Jagannathan, molly.jagannathan@troutman.com

Frank R. Ellerbe III, fellerbe@robinsongray



Robert Guild